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Attorneys for Defendant Manoah Ainuu

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA, BUTTE DIVISION**

JOHNATHAN TALBOT,

Plaintiff,

v.

MANOAH AINUU, and THE NORTH
FACE APPAREL CORP., A Delaware
Company,

Defendants.

Cause No. 2:23-CV-00066-BU-BMM
Hon. Brian Morris

Manoah Ainuu's
Motion to Dismiss and Special
Motion for Expedited Relief

Defendant Manoah Ainuu joins Arguments I, II.B, III and IV of The North Face's (TNF)'s motion (Doc. 25), which are equally applicable to both defendants. Mr. Ainuu moves, on his own behalf, for dismissal of this case as against him for failure to state a claim upon which relief can be granted pursuant to Fed. R. Civ.P. 12(b)(6) and relevant provisions of the Washington Uniform Public Expression

Protection Act, R.C.W. § 4.105.010, *et seq.*

The Court should award Mr. Ainuu his fees and costs related to this motion pursuant to R.C.W. § 4.105.090.

Pursuant to Local Rule 7.1(c)(1), the undersigned certifies that this is a dispositive motion, exempt from the requirement to ascertain and state the non-moving parties' positions.

DATED this 19th day of December, 2023.

GOETZ, GEDDES & GARDNER, P.C.

Attorneys for Manoah Ainuu



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